

3. Plaintiff, Kiley Tillotson, is an individual who resides in Lawrence County, Illinois.
4. Plaintiff is a “consumer” as defined by Section 803(3) of the Fair Debt Collection Practices Act, 15 U.S.C. section 1692a(3).

5. Defendant, Bonded Credit Bureau, Inc. is a corporation organized under the laws of the State of Kentucky. It is also doing business under the name drs/Bonded Collection Systems.
6. Defendant Bonded Credit Bureau, Inc. is a “debt collector” as defined by Section 803(6) of the Fair Debt Collection Practices Act, 15 U.S.C. section 1692a(6).
7. At all times relevant to this matter, Defendant Bonded Credit Bureau, Inc. was collecting a consumer debt as defined by Section 803(5) of the Fair Debt Collection Practices Act, 15 U.S.C. 1692a(5).

FAIR DEBT COLLECTION PRACTICES ACT

8. Plaintiff was the holder of a credit card issued by First Bank of Delaware. Plaintiff used this credit card account for the purchase of consumer goods and services.
9. Prior to December 5, 2007, Plaintiff default in her obligations to Bank of Delaware.
10. Prior to December 5, 2007, First Bank of Delaware placed the account for collection with defendant.
11. On December 5, 2007, during the early afternoon, an employee of the Defendant identifying himself as Mike Wallace contacted Plaintiff at her place of employment in an attempt to collect the debt.
12. Mike identified himself as an employee of First Bank of Delaware.
13. Mike asked Plaintiff if she had received the “wage garnishment letter”.
14. Plaintiff informed Mike that she had not received the letter. She also informed

him that she had filed for bankruptcy and that she was presented by counsel.

15. Mike continued to attempt to collect the debt.
16. Plaintiff finally asked for his facsimile number so that she could send him information regarding the bankruptcy. Plaintiff then ended the three minute telephone call.
17. Plaintiff then sent a facsimile to Mike requesting a copy of the purported "wage garnishment letter." A copy of the facsimile is attached hereto and incorporated herein by reference as Exhibit A.
18. About ten minutes later, an employee of the Defendant identifying himself as Mike Wallace placed a second telephone call to Plaintiff in an attempt to collect the debt.
19. Mike announced that he "was tired of playing games" with Plaintiff.
20. Mike stated that he was going to garnish her wages and she should have her attorney contact him. He then hung up without giving his telephone number.
21. Mike knew that the threat of wage garnishment was a misrepresentation because First Bank of Delaware did not possess either a judgment or voluntary wage assignment.
22. Plaintiff contacted First Bank of Delaware by telephone and learned that there was no Mike in the collection department and that it knew she had filed bankruptcy.
23. Plaintiff then sent a second facsimile to Defendant. A copy of that facsimile is attached hereto and incorporated herein by reference as Exhibit B.
24. Defendant Bonded Credit Bureau, Inc. violated the FDCPA when it made the misrepresentation that it was the actual creditor collecting its own debt in

violation of 15 U.S.C. § § 1692d, 1692d(6), 1692e, 1692e(10), and 1692e(14).

25. Defendant Bonded Credit Bureau, Inc. violated the FDCPA when it attempted to collect the debt from a consumer represented by counsel in violation of 15 U.S.C. § § 1692c, 1692c(a)(2).
26. Defendant Bonded Credit Bureau, Inc. violated the FDCPA when it made the misrepresentation that it could garnish her wages in violation of 15 U.S.C. § § 1692e, 1692e(4), 1692e(5) and 1692e(10).
27. Defendant Bonded Credit Bureau, Inc. violated the FDCPA when it made the misrepresentation that it collect the debt from her in violation of 15 U.S.C. § § 1692e, 1692e(4), 1692e(5) and 1692e(10).
28. As a result of Defendant's conduct, Plaintiff suffered actual damages.

WHEREFORE, Plaintiff Kiley Tillotson requests that the Court enter judgment in her favor and against Defendant Bonded Credit Bureau, Inc. for: (a) actual and statutory damages, (b) attorney's fees, litigation expenses and costs, and (c) such other or further relief as the Court deems appropriate.

KILEY TILLOTSON, Plaintiff

s/ Roy Jackson Dent

Roy Jackson Dent

Bar Number 6255835

Attorney for Plaintiff

BRANKEY & SMITH, P.C.

622 Jackson Avenue

Charleston, IL 61920

Phone: (217) 345-6222

Fax: (217) 345-6232

Email: rdent@brankeysmithpc.com

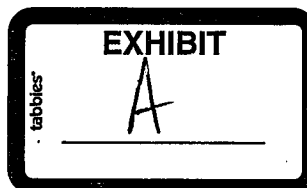
facsimile transmittal

To: Mike - First Bank of Delaware Fax: 513-793-1073
From: Kiley Tillotson Date: 12/5/2007
Re: Loan Pages: 1
CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Please fax me a copy of the letter you sent me for wage garnishment. My attorney would like to see if it matches up with what they have. Please fax to: 618-936-2367.

Thank you,
Kiley Tillotson



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facsimile transmittal

To: Mike Fax: 513-793-1073
From: Kiley Tillotson Date: 12/5/2007
Re:
CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

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For my attorney to call you you will have to give me a phone number instead of hanging up on me. I called the First Bank of Delaware number I have and they say they have me in bankruptcy. Which one are you with. Loan, credit card, etc.

My attorneys name is Roy Dent

Phone # 217-345-6222

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A fax back will be fine, since I am at work.

